

SHER TREMONTE LLP

June 23, 2025

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VIA E-MAIL

The Honorable Valerie E. Caproni
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: United States v. Joadin Espinal Rodriguez
Case No. 23 Cr. 494 (VEC)

Dear Judge Caproni:

We represent Joadin Espinal Rodriguez, a defendant in the above-referenced action. We write to respectfully request that the Court authorize a temporary modification to Mr. Espinal Rodriguez's bail conditions to allow him to travel to the District of New Jersey today and tomorrow for a psychological examination in connection with his sentencing submission. The undersigned apologize for the last-minute nature of this request, which is due to an oversight on the part of the undersigned counsel.

The evaluation is scheduled for today, June 23 from 11:00 A.M. to 4:00 P.M. and June 24 from 9:00 A.M. to 1:00 P.M. The testing center is located at:

Harborside Financial Center
2500 Plaza 5, 25th Floor
Jersey City, N.J. 07311

Mr. Espinal Rodriguez will travel directly to the testing site for the appointments and return to his residence or work immediately after the appointments end.

The undersigned have conferred with the government which consents to this request. The undersigned have also conferred with pre-trial services which has no objection to this request.

Respectfully submitted,

/s/ Noam Biale
Noam Biale
Courtney Gans

cc: William Kinder (AUSA) (by e-mail)

Application GRANTED. Defendant's conditions of release are modified to allow him to travel to the above-referenced address in New Jersey on June 23 and June 24, 2025.

SO ORDERED.



6/23/2025

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE